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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10 **(HONORABLE DANA M. SABRAW)**

11 UNITED STATES OF AMERICA,
12 Plaintiff,

13 v.
14

15 SANDRA KOLE (2)
16 Defendant.

) Case No. 07CR3406
) Date: March 14, 2008
)

) NOTICE OF MOTION AND MOTION TO
)
) (1) SEVER DEFENDANTS;
) (2) EXCLUDE STATEMENTS TAKEN IN
) VIOLATION OF MIRANDA
)

17 TO: KAREN HEWITT, UNITED STATES ATTORNEY, and
18 EUGENE LITVINOFF, ASSISTANT UNITED STATES ATTORNEY
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20 PLEASE TAKE NOTICE that as soon thereafter as counsel may be heard, the defendant, Ms.
21 Kole, by and through her counsel, Siri Shetty, will ask this Court to enter an order granting the following
22 motions.
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MOTIONS

The defendant, Sandra Kole, by and through her attorneys, Siri Shetty, pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law and local rules, hereby moves this Court for an order to:

1) Sever Defendants;

2) Exclude Statements Elicited in Violation of Miranda.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, and all other materials that may come to this Court's attention at the time of the hearing on these motions.

Respectfully submitted,

S/Siri Shetty

Dated: March 2, 2008

SIRI SHETTY

Attorneys for Ms. Kole

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